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Attorneys for Plaintiff
21 ORACLE AMERICA, INC.

22 UNITED STATES DISTRICT COURT
23 NORTHERN DISTRICT OF CALIFORNIA
24 SAN FRANCISCO DIVISION

24 ORACLE AMERICA, INC.,
25 Plaintiff,
26 v.
27 GOOGLE INC.,
28 Defendant.

Case No. CV 10-03561 WHA
**ORACLE'S ADMINISTRATIVE
MOTION TO FILE UNDER SEAL**
Dept.: Courtroom 8, 19th Floor
Judge: Honorable William H. Alsup

1 Plaintiff Oracle America, Inc. (“Oracle”) hereby moves to file portions of Exhibit V to the
2 Declaration of Gabriel M. Ramsey in Support of Oracle’s Opposition to Motion to Preclude
3 Submission of Willfulness to Jury (“Ramsey Declaration”) under seal pursuant to Civil Local
4 Rules 7-11 and 79-5.

5 The Order Approving Stipulated Protective Order Subject to Stated Conditions entered in
6 this case, ECF No. 68, states that when material has been designated as Confidential or Highly
7 Confidential – Attorneys’ Eyes Only, a party may not file it in the public record, but must seek to
8 file it under seal pursuant to Civil Local Rule 79-5. Stipulated Protective Order § 14.4, ECF No.
9 66.

10 Google Inc. (“Google”) has designated Exhibit V to the Ramsey Declaration as “HIGHLY
11 CONFIDENTIAL – ATTORNEY’S EYES ONLY” pursuant to the Protective Order. Oracle met
12 and conferred with Google’s counsel, but Google’s counsel was unwilling to de-designate certain
13 portions of Exhibit V, which remain designated “HIGHLY CONFIDENTIAL – ATTORNEY’S
14 EYES ONLY” pursuant to the Protective Order. *See* Declaration of Gabriel M. Ramsey in
15 Support of Oracle’s Administrative Motion to File Under Seal ¶4. Therefore, Oracle moves to
16 seal these portions of Exhibit V to the Ramsey Declaration pursuant to the Protective Order.

17 Oracle states no position as to whether disclosure of these materials would cause harm to
18 Google or any third parties.

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1 Dated: August 20, 2015

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